

NOV 20 2019

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA)
) No. 3:19-cr-00287
v.)
)
) 18 U.S.C. § 2
XU ZHANG) 18 U.S.C. § 1512(c)(1)
) 18 U.S.C. § 1512(k)

[Signature]
DEPUTY CLERK

I N D I C T M E N T

THE GRAND JURY CHARGES:

Introduction

At all times relevant to this Indictment:

1. The defendant, **XU ZHANG**, was a Chinese national and the boyfriend of G.X.
2. G.X. was arrested on August 22, 2019, and incarcerated following her indictment on federal charges. ✓
3. G.X. committed suicide in custody on November 1, 2019.
4. WeChat is a Chinese multi-purpose messaging, social media, and mobile payment application that can be accessed by mobile devices, personal computers, and the internet. ✓

COUNT ONE

5. Paragraphs 1 through 4 of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.
6. Beginning not later than August 22, 2019, and continuing thereafter through on or about November 8, 2019, in the Middle District of Tennessee and elsewhere, **XU ZHANG** and G.X. did willfully, knowingly, and unlawfully combine, conspire, confederate, and agree with each other, and with others known and unknown to the Grand Jury, to corruptly alter, destroy, mutilate,

and conceal records, to wit: WeChat conversations, contacts and access identifiers, including codes, with the intent to impair the records' integrity and availability for use in an official proceeding, that is, a federal grand jury investigation and federal court proceedings, in violation of Title 18, United States Code, Section 1512(c)(1).

All in violation of Title 18, United States Code, Section 1512(k).

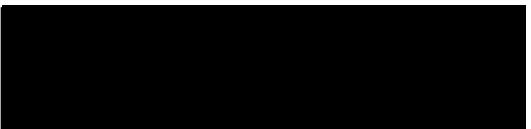
COUNT TWO

7. Paragraphs 1 through 4 of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

8. On or about September 7, 2019, in the Middle District of Tennessee and elsewhere, **XU ZHANG**, aided and abetted by G.X. and others, did corruptly alter, destroy, mutilate, and conceal a record, to wit: WeChat conversations, contacts and access identifiers, including codes, and did attempt to do so, with the intent to impair its integrity and availability for use in an official proceeding, that is, a federal grand jury investigation and federal court proceedings.

In violation of Title 18, United States Code, Sections 1512(c)(1) and 2.

A TRUE BILL:



GRAND JURY FOREPERSON

DONALD Q. COCHRAN
UNITED STATES ATTORNEY

Sara Beth Myers
SARA BETH MYERS
ASSISTANT UNITED STATES ATTORNEY